

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

APR 15 1997

Federal Communications Commission
Office of Secretary

In the Matter of

Amendment of Rules and Policies
Governing Pole Attachments

)
)
)
)

CS Docket No. 97-98

COMMENTS OF SBC COMMUNICATIONS INC. IN SUPPORT OF
MOTION FOR EXTENSION OF TIME

SBC Communications, Inc. ("SBC") hereby submits its comments in support of the Motion for Extension of time in the above-captioned proceeding filed on April 4, 1997 by AEP Service Corp., Commonwealth Edison Co., Duke Power Co., Florida Power & Light Co. and Northern States Power Co. (collectively, the "Electric Utilities").

On April 4, 1997, the Electric Utilities requested an extension of time for filing comments and reply comments in the above-captioned proceeding. Among the reasons presented by the Electric Utilities were the complex accounting and engineering issues that a wide variety of interested parties must analyze, the novelty of the issues relating to rates for conduit occupancy and the possibility that a second pole attachment rulemaking under the new provisions of the Telecommunications Act of 1996 may be issued in the near future.

SBC agrees that the accounting and engineering issues presented in this rulemaking are very complex and require careful and deliberate consideration. The original schedule for comments would not be adequate for those who are seriously interested in providing detailed analyses of their views concerning all of the issues being explored in this rulemaking. The time allowed for comments would be especially inadequate for those who have not had experience in recent years with the Commission's pole attachment regulations. For example, in states where cable operator pole attachments have been regulated by state commissions, utilities may not have

No. of Copies rec'd
List ABCDE

024

any experience at all with the Commission's pole attachment regulations. However, utilities in such states may have an interest in the Commission's pole attachment regulations either because of the potential indirect impact on the future course of state regulation or because the Commission's regulations may become applicable in such states in the future.

SBC believes that an extension of time is warranted in order to allow all interested parties to fully analyze all of the issues presented in this rulemaking. Ultimately, by extending time, the Commission will facilitate its own decisionmaking process because it will have complete responses to all of its inquiries from all perspectives. Thus, an extension of time would enable the Commission to reach a well-balanced result on all issues.

For the foregoing reasons, SBC respectfully requests that the Commission grant an extension of time as requested by the Electric Utilities.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By Jonathan W. Royston
James D. Ellis
Robert M. Lynch
David F. Brown
175 E. Houston, Room 1254
San Antonio, Texas 78205
(210) 351-3478

Lori L. Ortenstone
525 B Street, Room 900
San Diego, California 92101
(619) 237-3329

Margaret E. Garber
1275 Pennsylvania Avenue N.W.
Washington, D.C. 20004
(202)383-6472

ATTORNEYS FOR SBC
COMMUNICATIONS INC.

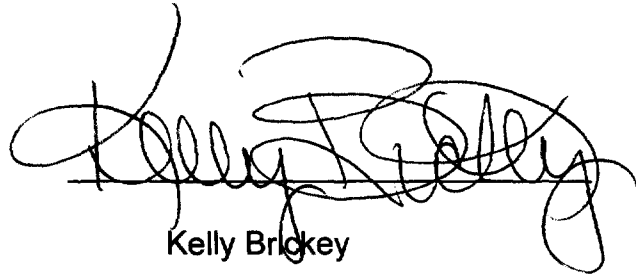
Durward D. Dupre
Mary W. Marks
Jonathan W. Royston
(314) 235-2507

ATTORNEYS FOR SOUTHWESTERN BELL
TELEPHONE COMPANY

April 15, 1997

CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing " Comments of SBC Communications Inc.", has been served April 15, 1997, to the Parties of Record.



Kelly Brickey

April 15, 1997

INTERNATIONAL TRANSCRIPTION
SERVICES INC
2100 M STREET NW
SUITE 140
WASHINGTON DC 20037

MICHAEL T MCMENAMIN
FEDERAL COMMUNICATIONS COMMISSION
CABLE SERVICE BUREAU
2033 M STREET N W
SUITE 140
WASHINGTON DC 20037

UNITED STATES TELEPHONE ASSOCIATION
MARY MCDERMOTT
LINDA KENT
KEITH TOWNSEND
HANCE HANEY
1401 H STREET NW
WASHINGTON DC 20005-2164

MCDERMOTT WILL & EMERY
ATTORNEYS FOR
AEP SERVICE CORPORATION
COMMONWEALTH EDISON COMPANY
DUKE POWER COMPANY
FLORIDA POWER AND LIGHT COMPANY
NORTHERN STATES POWER COMPANY
1850 K STREET SUITE 500
WASHINGTON DC 20006